

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-2

A.Y. STRAUSS LLC

Eric H. Horn, Esq.

Heike M. Vogel, Esq.

Maria A.G. Harper, Esq.

290 West Mount Pleasant Avenue, Suite 3260

Livingston, New Jersey 07039

Tel. (973) 287-5006

Fax (973) 533-0127

*Counsel to the Debtors
and Debtors in Possession*

In re:

JTRE 14 VESEY LLC,

Debtor.

Chapter 11

Case No. 24-12087 (MBK)

(Jointly Administered)

**STIPULATION BETWEEN JTRE 14 VESEY LLC AND CPIF MRA, LLC
EXTENDING THE TIME BY WHICH THE DEBTOR HAS TO FILE A PLAN OR
BEGIN MAKING ADEQUATE ASSURANCE PAYMENTS TO JUNE 3, 2024**

The above-captioned debtor and debtor in possession (the “**Debtor**”) and CPIF MRA, LLC (the “**Lender**”) hereby enter into this stipulation (the “**Stipulation**”) extending the time by which the Debtor has to file a Plan of reorganization or liquidation (a “**Plan**”) or begin making adequate assurance payments pursuant to Bankruptcy Code section 362(d) to June 3, 2024. Each of the Debtor and the Lender are a “**Party**” and are collectively referred to herein as the “**Parties.**”

RECITALS

WHEREAS, on February 28, 2024 (the “*Petition Date*”), the Debtor filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the “*Bankruptcy Code*”) in the United States Bankruptcy Court for the District of New Jersey (the “*Court*”);

WHEREAS, the Debtor owns, in fee, the real property at located at 14 Vesey Street, New York, NY 10007 (the “*Property*”);

WHEREAS, on March 8, 2024, the Lender filed a motion seeking, among other things dismissal of the Debtor’s chapter 11 case;

WHEREAS, by Court order dated April 8, 2024 [Docket No. 35], the Court required the Parties to mediate the disputes between the Parties raised in the Lender’s motion to dismiss and as of the date of this Stipulation, such mediation is continuing;

WHEREAS, the deadline to file a Plan or begin making adequate protection payments is May 28, 2024; and

WHEREAS, the Parties wish to extend the deadline to file a Plan to June 3, 2024.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED AS FOLLOWS:

1. The recitals set forth above are incorporated herein by this reference as though set forth herein at length.
2. The deadline to file a Plan is extended to June 3, 2024.
3. Each person who executes this Stipulation on behalf of a Party represents and warrants that he or she is duly authorized and has requisite authority to execute and deliver this same on behalf of such Party and to bind his or her respective Party to the terms and conditions of this Stipulation.

IN WITNESS WHEREOF, the Parties hereto have caused this Stipulation to be executed as of the day and year written below.

Dated: May 28, 2024

A.Y. STRAUSS LLC

**BENESCH, FRIEDLANDER, COPLAN
& ARONOFF LLP**

/s/ Eric H. Horn

Eric H. Horn, Esq.
Heike M. Vogel, Esq.
Maria A.G. Harper, Esq.
290 West Mount Pleasant Avenue, Suite 3260
Livingston, New Jersey 07039
Tel. (973) 287-5006
Fax (973) 533-0127

Counsel to the Debtor

/s/ Kevin M. Capuzzi

Kevin M. Capuzzi, Esq.
1313 North Market Street, Suite 1201
Wilmington, DE 19801
Telephone: (302) 442-7010
Facsimile: (302) 442-7012

Counsel to the Lender